

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Anthony Landolfi, Esquire
Professional Services Building
295 Bridgeton Pike
P.O. Box 111
Mantua, NJ 08051
856-468-5900
Attorney for Debtor

In Re:

ROBERT M. MORACE,

Debtor.

Case No.: 17-27250

Judge: Jerrold N. Poslusny

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☒ Certification of Default filed by the Chapter 13 Trustee,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

My wife and daughter were in a very serious auto accident. My wife was seriously injured and is out of work for a period of time, which caused us to fall behind in our payments. We are waiting for her disability payments to begin, which we believe will be in August 2019. I have forwarded my May and June Trustee payments, and will cure July arrears by the end of July 2019.

☐ Other (**explain your answer**):

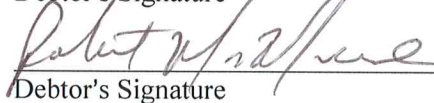
3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: July 9, 2019

Date: _____

/s/ Robert M. Morace

Debtor's Signature


Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

066784
DATE
11-24
121081
Remitter
Purchaser
Purchaser Account
Purchaser ID
Funding Source
Electronic Funds
PAY TO THE ORDER OF

ISABEL C BALBOA***

Four hundred seventy-one dollars and no cents

Payee Address:

WELLS FARGO BANK, N.A.
1315 WOODBURY GLASSBORO RD
WINDHAM, NJ 08090
FOR INQUIRIES CALL (480) 384-3122

NOTICE TO PURCHASER: IF STOP PAYMENT IS PLACED ON THIS INSTRUMENT, WELLS FARGO BANK MAY IMPOSE A WAITING PERIOD BEFORE ISSUING A REPLACEMENT OR REFUND.

Purchaser Copy

June 28, 2019

SERIAL #: 6768405673
ACCOUNT#: 4861-509788

VOID IF OVER US \$ 471.00
NON-NEGOTIABLE

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Purchaser Copy

June 2019

June 28, 2019

SERIAL #: 6768405683
ACCOUNT#: 4861-509788

VOID IF OVER US \$ 471.00
NON-NEGOTIABLE